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16 Attorneys for Plaintiff  
17 PATAGONIA, INC.

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19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
21 **WESTERN DIVISION – LOS ANGELES**

22 PATAGONIA, INC.,

23 Plaintiff,

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DOES 1-10,

Defendants.

Case No. 2:25-cv-03293

**DECLARATION OF KOURTNEY  
SPEER IN SUPPORT OF  
PATAGONIA, INC.'S APPLICATION  
FOR LEAVE TO FILE UNDER  
SEAL**

I, Kourtney Speer, hereby declare as follows:

1. I am an attorney admitted to practice in the State of California and before this Court. I am an associate with the law firm of Verso Law Group LLP, attorneys of record for plaintiffs Patagonia, Inc. ("Patagonia") in this proceeding.

1 I make this declaration based on my personal knowledge and, if called as a witness,  
2 I could and would be competent to testify to the matters set forth below.

3 2. On April 15, 2025, Patagonia filed its Complaint and Ex Parte  
4 Application For Temporary Restraining Order wherein Patagonia excessively  
5 referenced confidential, sensitive, information regarding the identities of the  
6 Defendants behind the widespread, counterfeiting scheme alleged in the Complaint  
7 and TRO Application. It is necessary that Defendants are not given notice of  
8 Plaintiff's allegations in its Complaint and TRO Application in order for Patagonia to  
9 obtain its requested relief.

10 3. I have worked on several enforcement actions on behalf of Patagonia. In  
11 recent enforcement actions filed by Patagonia involving similar conduct, including  
12 the use of third-party platforms, public filings have attracted significant media  
13 attention, including coverage on social media platforms. Based, in part, on that  
14 experience we have good reason to believe that public filing of this action is likely to  
15 alert Defendants prematurely, significantly impairing Patagonia's ability to obtain  
16 effective relief.

17 4. Therefore, Patagonia now seeks to file the below identified documents  
18 under seal.

19 5. In Plaintiff's Complaint, Patagonia has identified parties responsible for  
20 operating an elaborate, widespread, counterfeiting scheme, and set out details about  
21 the mechanics of that counterfeiting scheme, including certain accounts and  
22 resources that Defendants use to source, sell, and distribute counterfeit products.  
23 This information is the product of Patagonia's confidential investigation.

24 6. In Plaintiff's TRO Application, Patagonia has identified parties  
25 responsible for operating an elaborate, widespread counterfeiting scheme, and set  
26 out details about the mechanics of that counterfeiting scheme, including certain  
27 accounts and resources that Defendants use to source, sell, and distribute counterfeit  
28 products. This information is the product of Patagonia's confidential investigation.

1 Patagonia has also included details regarding the severity of Defendants’  
2 counterfeiting scheme and how it has caused Patagonia irreparable harm.

3 7. In Plaintiff’s Declaration of Traci Escamilla in Support of Patagonia,  
4 Inc.’s Ex Parte Application For Temporary Restraining Order and Order to Show  
5 Cause (“Escamilla Decl.”), Patagonia identifies the identity of an importer of  
6 counterfeit products that Patagonia has since settled with due to their cooperation  
7 with Patagonia’s confidential investigation. The Escamilla Declaration also discusses  
8 the mechanics of the counterfeiting scheme.

9 8. In Plaintiff’s Declaration of Paymaneh Parhami, Patagonia, Inc.’s Ex  
10 Parte Application For Temporary Restraining Order and Order to Show Cause  
11 (“Parhami Decl.”) has identified parties responsible for operating an elaborate,  
12 widespread, counterfeiting scheme, and set out details about the mechanics of that  
13 counterfeiting scheme, including certain accounts and resources that Defendants use  
14 to source, sell, and distribute counterfeit products. This information is the product  
15 of Patagonia’s confidential investigation.

16 9. In Plaintiff’s Proposed Order Granting Plaintiff Patagonia, Inc.’s  
17 Application for Temporary Restraining Order and Order to Show Cause (“TRO  
18 Proposed Order”), Patagonia has identified parties responsible for operating an  
19 elaborate, widespread, counterfeiting scheme, and set out details about the  
20 mechanics of that counterfeiting scheme, including certain accounts and account  
21 information, identities of third party platforms used in furtherance of the scheme,  
22 and resources that Defendants use to source, sell, and distribute counterfeit products.  
23 This information is the product of Patagonia’s confidential investigation.

24 10. In Plaintiff’s Application for Leave to File Under Seal (“Application to  
25 Seal”), Patagonia identifies, in the caption, Defendants’ names, which it discovered  
26 through its confidential investigation.

11. In this document, Plaintiff's Declaration of Kourtney Speer in Support of Application for Leave to File Under Seal, Patagonia identifies, in the caption, Defendants' names, which it discovered through its confidential investigation.

12. In Plaintiff's Proposed Order Granting Plaintiff Patagonia, Inc.'s Application for Leave to File Under Seal ("Sealing Proposed Order"), Patagonia identifies, in the caption, Defendants' names, which it discovered through its confidential investigation.

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Executed on April 15, 2025, at San Francisco, California.

  
KOURTNEY SPEER